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12 Attorneys for Defendants
SONY COMPUTER ENTERTAINMENT AMERICA LLC and
13 SONY NETWORK ENTERTAINMENT INTERNATIONAL
LLC
14

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 QUENTIN REAVES, DANIELLE BOGAN, and
20 ROBERT MAYO, on behalf of themselves and all
others similarly situated,

21 Plaintiffs,

22 v.

23 SONY COMPUTER ENTERTAINMENT
24 AMERICA LLC, a Delaware Limited Liability
Company; and SONY NETWORK
25 ENTERTAINMENT INTERNATIONAL LLC, a
Delaware Limited Liability Company,

26 Defendants.
27
28

Case No. 3:11-cv-02254-EMC

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT ; ORDER**

Judge: Magistrate Judge Edward M. Chen

1 WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) and
 2 Sony Network Entertainment International LLC (“SNEI”), as well as certain related entities
 3 (collectively, the “Sony Defendants”), have been named as defendants in at least twenty-one (21)
 4 putative class action lawsuits within this District, to date (collectively, the “N.D. Cal. Sony
 5 Litigations”);

6 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
 7 least eighteen (18) putative class action lawsuits pending outside this District, to date, including at
 8 least six (6) suits in the Central District of California, one (1) suit in the Southern District of
 9 California, one (1) suit in the Southern District of New York, two (2) suits in the Eastern District
 10 of New York, one (1) suit in the District of Massachusetts, one (1) suit in the Eastern District of
 11 Michigan, two (2) suits in the Southern District of Texas, one (1) suit in the District of
 12 Connecticut, one (1) suit in the District of New Jersey, one (1) suit in the Northern District of
 13 Ohio, and one (1) suit in the Southern District of Florida (collectively, with the N.D. Cal. Sony
 14 Litigations, the “U.S. Sony Litigations”);

15 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
 16 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
 17 to date, and as to which other responses, including the Sony Defendants’ response, are due by
 18 June 2, 2011.

19 WHEREAS, the current deadline for SCEA and SNEI to respond to the Complaint in the
 20 above-entitled action is June 1, 2011;

21 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
 22 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
 23 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
 24 JPML;

25 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
 26 by and through their respective counsel, hereby stipulate as follows:

27 The deadline for the defendants to respond to the Complaint in the above-captioned action
 28 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict

litigation centralizing the above-captioned action with other matters, or if centralization is denied by the JPML, then 30 days from the date of such order denying centralization.

Either party may seek ex parte relief from this stipulated Order for good cause shown, including, but not limited to, Defendants' filing of a responsive pleading in a related case.

Dated: May 17, 2011

MARK A. CHAVEZ
NANCE F. BECKER
CHAVEZ & GERTLER LLP

By: /s/ Mark A. Chavez/s/ [as authorized]
Mark A. Chavez

Attorneys for Plaintiffs
QUENTIN REAVES
DANIELLE BOGAN
ROBERT MAYO

Dated: May 17, 2011

HARVEY WOLKOFF
THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

Attorneys for Defendants
SONY COMPUTER
ENTERTAINMENT AMERICA LLC and
SONY NETWORK ENTERTAINMENT
INTERNATIONAL LLC

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 5/20/11

By: U. S. District Judge

